

**Zimny, Chris**

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**From:** Glenda Marsh [GDMARSH@dfg.ca.gov]  
**Sent:** Monday, June 16, 2008 11:23 AM  
**To:** Zimny, Chris  
**Subject:** DFG comments T/I geographic scope

Hi Chris,

Here is an additional comment from DFG on the geographic scope of the T/I rules from DFG's Region 1 Redding office Timberland Planning program supervisor, Curt Babcock. This is in response to the May 13, 2008 letter sent to agencies soliciting information about the geographic scope of the T/I rules.

In general, it's a good idea to question the validity of the planning watershed as the appropriate size in relation to the limit of downstream effects on salmon. Sediment and large woody debris may be more important factors than temperature and nutrients when considering watershed size and detrimental downstream effects. For example, temperature and nutrients may more easily attenuate or normalize once they reach the next planning watershed. The T/I rules should be applied to the planning watershed upstream or to the larger Hydrologic Sub-Area in order to take into account detrimental downstream effects. For example, the new 2112 regulations regarding take of listed coho salmon specifically state that sediment may have a significant effect on the planning watershed downstream of the operations (see CCR 14 section 787.9.(b)(1)).

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